

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 07-171-JJF
	:	
ANGELA JONES,	:	
	:	
Defendant.	:	

**MOTION FOR TEMPORARY RELEASE ON RECOGNIZANCE BAIL TO ATTEND
SISTER'S FUNERAL**

Defendant, Angela Jones, by and through her undersigned counsel, Eleni Kousoulis, hereby moves the Court for an Order permitting the defendant to be released on recognizance bail, with Tamar Daniels acting as custodian, for 50 hours to attend her sister's funeral.

In support of this motion, the Defendant submits as follows:

1. On December 13, 2007, a four count Indictment was returned against Angela Jones charging her with Possession of a Firearm by Felon, in violation of Title 18, U.S.C. §§ 922(g)(1) and 924(a)(2); Making a False Statement to a Firearm's Dealer with the Intent to Deceive, in violation of Title 18, U.S.C. §§ 922(a)(6) and 924(a)(2); Making a False Statement with Respect to Information to be Kept by a Firearm's Dealer, in violation of Title 18, U.S.C. § 924(a)(1); and Knowingly Possessing Cocaine Base, in violation of Title 21, U.S.C. § 844(a).

2. Following a Detention Hearing on November 21, 2007, Ms. Jones was ordered detained pending trial. Ms. Jones is currently detained at the Baylor Women's Correctional Institution.

3. On January 19, 2008, Ms. Jones' sister, Anita Jones, passed away. The funeral for Anita Jones will be held on Friday, January 25, 2008 at 2:00 p.m., in Griffin, GA. See Exhibit A.

4. Ms. Jones would very much like to attend her sister's funeral, as expressed by Ms. Jones in her letter dated January 21, 2008. See Exhibit B.¹

5. Ms. Jones respectfully requests to be released on recognizance bail, with Tamar Daniels acting as custodian, for 50 hours (leaving Thursday morning, January 24, 2008, and returning Saturday afternoon, January 26, 2008) to allow her to travel to Georgia to attend her sister's funeral.

6. While in Georgia, Ms. Jones will stay with her mother, Susie Nettles, at 1445 Upland Drive, Griffin, GA 30223.

7. Ms. Jones will contact pre-trial services (a) when she arrives in Georgia, and (b) when she leaves Georgia to return to Delaware.

8. Assistant United States Attorney, Shawn Weede, the attorney handling this case for the government, does not oppose the defendant's motion, making this motion unopposed.

WHEREFORE, it is respectfully requested that Defendant, Angela Jones, be granted temporary release for 50 hours to attend her sister's funeral in Griffin, GA.

Respectfully submitted,

/s/

Eleni Kousoulis, Esquire
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
(302) 573-6010
ecf_de@msn.com
Attorney for Defendant Angela Jones

Dated: January 23, 2008

¹Letters from Angela Jones' mother, Susie Nettles, and her father, Frank Jones, are also attached to this motion as "Exhibit C".

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ANGELA JONES,	:	
	:	
Defendant.	:	

ORDER

Having considered Defendant Angela Jones' Motion for Temporary Release on Recognizance Bail to Attend Sister's Funeral, **IT IS HEREBY ORDERED** this _____ day of _____, 2008, that Defendant's Motion is GRANTED, with the following conditions:

(1) Defendant, Angela Jones, shall be released at 10:00a.m. on Thursday, January 24, 2008, from the Baylor Women's Correctional Institution, in the care and custody of Tamara Daniels;

(2) Defendant is to drive directly to Griffin, GA, with Tamara Daniels, and stay overnight with her mother, Susie Nettles, at 1445 Upland Drive, Griffin, GA 30223, and contact pre-trial services upon her arrival.

(3) Defendant is to attend her sister, Anita Jones', funeral at 2:00 p.m. on Friday, January 25, 2008, at the Haisten McCullough Funeral Home, located at 1155 Everee Inn Road, Griffin, GA 30224;

(4) Following the funeral, the defendant is to drive directly back to Delaware, and turn herself into the Baylor Women's Correctional Institution, no later than Saturday, January 26, 2008, at 12:00 p.m; the defendant will contact pre-trial services to notify them of her departure from Georgia.

Honorable Joseph J. Farnan, Jr.
United States District Court

EXHIBIT A

Haisten McCullough Funeral Home

January 21, 2008

To Whom It May Concern:

This letter is to officially notify you of the funeral arrangements for Ms. Anita Jones. Her funeral will be held on Friday January 25, 2008 at 2:00 PM in our chapel. On behalf of the Jones family we thank you for your help with this matter.

Sincerely,


Timothy D. Daniel
Funeral Director/Manager



1155 Everree Inn Rd. • Griffin, GA 30224 • 770-229-4994 • Fax 770-227-2711
DignityMemorial.com

EXHIBIT B

January 21, 2008

Dearest Mr. Weede,

I am petitioning to the court from the depths of my heart. My only sister has passed away from this life this past Saturday and I am begging you on bended knees to pardon me and agree with my release, presented by my attorney, so that I can attend my sister's funeral and say my final goodbye.

I place myself on the mercy
of the court. I will agree to
any and all stipulations that
the court may deem necessary.
I beg that your decision be
expedited as the funeral is
this Friday, January 25, 2008
at 2:00 pm.

Thank You,
Angela Jones

EXHIBIT C

1445 Upland Dr.
Griffin, Ga. 30223
Jan. 21-08

Attorney Kausoulia,
I am Susie Nettles, Angela Jones' Mother. I have talked to you a couple of times.

Angela's Sister died Saturday Morning and I need Angela so much to help me with things, and member of the family, and everything, if I can be honest. I need in more than one way, I need her help in every way. The funeral is Friday Jan 25 at 2:00 PM.

So if you can have or get her released for her Sister's funeral, and other things it would help me more than you know.

And whatever you can do, to get her here I would terribly appreciate it.

P.S Thank you for your assistance and cooperation.


Much Appreciated
Susie Nettles

Angela's Mom

Frank Jones
38 W Logan Street
Philadelphia, PA 19144
(215) 849-8892

Dear Public Defender E Kosoulis, Prosecutor S Weede, or Judge M Thyng;

I, Frank Jones, father of Angela Jones, do plead with the court for the release of my daughter for the sole purpose to attend my eldest daughters' funeral. Angela and her sister Anita were very close and when Anita got sick, Angela assumed the role of mother for Anita's children. She has been the only mother they have known as my eldest daughter hasn't recovered from the illness she was inflicted with for more than ten years. I do recognize that Angela is in legal trouble and has agreed to accept the responsibility for what she did and in discussing the matter with Angela I believe that she is remorseful for what she has done. Angela has not been in any unlawful issues for the past several years and has been trying very hard to stay on the right track. Angela made a very poor decision in judgment and she is being held for that mistake. Please do not punish her by not allowing her the one chance that she has to say goodbye to her sister. I beg of you in behalf of the Jones family to allow Angela to attend her sisters' funeral which is being held on Friday, January 25, 2008 at the Haisten McCullough Funeral Home, 1155 Everee Inn Road, Griffin, GA 30224.

Sincerely Yours,

Frank Jones